

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No.

18-MJ-230 FLN

MICHAEL MCWHORTER
JOSEPH MORRIS
MICHAEL HARI

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about August 5, 2017, in Hennepin County, in the State and District of Minnesota, defendant(s)

maliciously damaged, by means of fire and explosives, the Dar al-Farooq Islamic Center, a building used in interstate and foreign commerce, and in an activity affecting interstate or foreign commerce

in violation of Title 18, United States Code, Section(s) 844(i).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Complainant's signature


Ryan J. Westby, Task Force Officer
FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

3/13/18 4:00pm

City and State: Minneapolis, MN

Judge's Signature

The Honorable Franklin L. Noel
United States Magistrate Judge

Printed Name and Title

SCANNED

MAR 14 2018

U.S. DISTRICT COURT MPLS

2. I respectfully submit that the facts set forth in this affidavit constitute probable cause to believe that Michael McWHORTER, JOSEPH MORRIS, and

MICHAEL HARI have committed the crime of maliciously damaging, by means of fire and explosives, a building used in interstate or foreign commerce, or in any activity affecting interstate or foreign commerce, in violation of Title 18, United States Code, Section 844(i). I am thoroughly familiar with the facts of this case. This affidavit sets forth those facts which I believe necessary to establish probable cause. I make no claim that this affidavit sets forth all of my knowledge about this case. This affidavit includes information I have received from other law enforcement personnel. In several places, this affidavit draws upon a complaint affidavit subscribed and sworn to before a federal magistrate judge in Springfield, Illinois on March 13, 2018. Your affiant has read that complaint affidavit.

3. On August 5, 2017, at approximately 5:05 in the morning, a window of the imam's office at the Dar al-Farooq Islamic Center and Mosque, 8201 Park Avenue South, Bloomington, Minnesota, was broken, and a pipe bomb was thrown into the Islamic Center through the broken window. The pipe bomb exploded and started a fire in the imam's office. The building's fire suppression system activated and promptly put out the fire. The imam's office, and items in the imam's office, suffered explosion, fire, and water damage. The mosque also suffered, as noted above, a broken window.

4. The Dar al-Farooq Islamic Center is used not only for religious purposes, but also for commercial purposes. The al-Jazari Institute is housed at the Dar al-Farooq Islamic Center. The al-Jazari Institute operates a dugsi, or Islamic religious school for children, and did so on August 5, 2017. The dugsi is a fee-based school. During July of 2017, the month before the bombing, the al-Jazari Institute deposited over \$180,000 in its bank account, and paid out over \$150,000 from that bank account.

5. The pipe bomb was constructed of polyvinyl chloride, a plastic-like material better known by its initials, "PVC". Police bomb squad officers who arrived at the imam's office smelled sulfur, which, from their training and experience, they knew to be an indicator that black powder had been used as the explosive in the device. A melted, plastic container was found in the imam's office, and there was a stain of diesel fuel on the carpet and padding underneath the remnants of the pipe bomb. These facts are consistent with diesel fuel having been used as the accelerant for a black-powder pipe bomb. After going through the window, the pipe bomb landed only a short distance inside the imam's office.

6. An eyewitness, who was outside the mosque, turned around when s/he heard the sound of breaking glass, just in time to see a man get into a dark-colored pickup. The eyewitness stated that as soon as the man got in, the pickup truck drove out of the Islamic Center's parking lot at high speed, and turned north on Park Avenue.

7. On November 7, 2017, at approximately 7:30 a.m., a staff member of the Women's Health Practice, 2125 South Neil Street, Champaign, Illinois, arrived to open the clinic for the day. This clinic provides women's health services, including abortions. The staff member found a broken window, glass on the floor, and a device inside the surgery room. The device had not exploded.

8. Multiple federal and local law enforcement agencies responded to the Women's Health Practice. The device was rendered safe by law enforcement. The device itself was described as a segment of PVC pipe with a plastic cap on one end and duct tape over the other end. The powder located within the pipe was determined to contain thermite, a pyrotechnic compound. A magnesium strip was also present in the device. The

combination of these factors led the bomb technician to the initial conclusion that the device was designed to burn. Responders also noted that the room in which the device was located was the surgical room and contained oxygen tanks.

9. The FBI in Illinois investigated the clinic bombing. This investigation led, on March 10, 2018, to an interview of Michael McWHORTER, a defendant in this case. In his March 10, 2018 interview McWHORTER admitted his involvement, and the involvement of Michael HARI and Joseph MORRIS, in the clinic bombing, and also in the bombing of the Dar a-Farooq Islamic Center.

10. In addition, on January 27, 2018, an FBI-Illinois confidential source (CS) provided information that three individuals - HARI, McWHORTER, and MORRIS – were responsible for the bombing carried out at the Dar al-Farooq Islamic Center, as well as the attempted bombing at the Women's Health Practice in Champaign, Illinois. CS is aware of this information because CS had previously worked for HARI, who recruited CS into an organization led by HARI.¹

11. CS reported seeing, during a meeting on or about January 27, 2018, in the group's possession, illegal firearms (fully automatic), M4s, and tannerite, which the group locked in a safe inside HARI's store/office in Clarence, Illinois. CS also said that one night when CS was drinking with MORRIS and McWHORTER, MORRIS began talking about throwing a black powder pipe bomb at a mosque in Minnesota. MORRIS told CS that he

¹ CS has a criminal history that includes convictions for possession of drug paraphernalia/possession of cannabis charges in the late 1990s. In the early 2000s, CS had a conviction for drunk driving and misdemeanor assault. CS currently has a pending attempted assault charge. CS has been paid \$1,000 by the FBI for information provided.

made the pipe bomb and that McWHORTER threw it in the mosque. MORRIS claimed HARI was going to pay them \$18,000 for their participation in the Minnesota bombing. MORRIS later told CS that he made and placed the incendiary device at the Women's Health Practice in Champaign. MORRIS complained to CS that it did not go off and MORRIS had no idea why. MORRIS told CS that the truck, which was used to get away, was rented in Champaign, possibly at Enterprise Rent-A-Car.

12. In his March 10, 2018 interview, McWHORTER admitted to his participation in the attempted bombing of the Women's Health Practice on November 7, 2017. McWHORTER said HARI, MORRIS, and McWHORTER were in a gray Dodge Ram 2500, which HARI rented at Enterprise Rent-A-Car in Champaign. (Records obtained from Enterprise revealed that HARI had rented a grey Dodge Ram at the time the pipe device was left in the women's clinic.) McWHORTER said the thermite device was made before the attempted bombing. McWHORTER said HARI made the device out of a white PVC pipe. McWHORTER said "in the middle of the night" MORRIS was dropped off; that MORRIS proceeded to smash the window and threw the device in the window at the practice; and that they picked MORRIS up north of the practice. McWHORTER said they would sometimes use a magnesium strip to set off a thermite device. According to McWHORTER, the magnesium strip sets off the thermite device a lot faster "than a normal wick would." He said the magnesium strip looks like tape, but it is metal, "blackish grey in color."

13. McWHORTER also admitted to his participation in the bombing of the Dar al-Farooq Islamic Center on August 5, 2017. McWHORTER said McWHORTER, HARI,

and MORRIS drove to Minnesota in a charcoal gray Nissan Frontier, which HARI rented from Enterprise Rent-A-Car in Champaign, Illinois. Records obtained from Enterprise Rental show that HARI rented a black Nissan Frontier Crew Cab on July 27, 2017, with a beginning mileage of 13,873. The vehicle was returned on August 6, 2017, (the day after the Dar al-Farooq bombing) with an ending mileage of 16,948. According to Google maps, the round trip mileage from Champaign, Illinois to Bloomington, Minnesota is approximately 1,040 miles.

14. According to McWHORTER, HARI picked up MORRIS and McWHORTER from their homes prior to departing Illinois. HARI, McWHORTER, and MORRIS each had specific roles for the bombing. HARI was the driver, MORRIS was responsible for smashing the window in, and McWHORTER was responsible for throwing the bomb in the window. McWHORTER claimed it was HARI's idea to target the Mosque. McWHORTER said they did not intend to kill anyone, but they wanted to "scare them out of the country" (referring to Muslims), because they push their beliefs on everyone else. McWHORTER also said they committed the bombing mainly to "show them hey, you're not welcome here, get the fuck out." McWHORTER said MORRIS smashed the window in with a sledgehammer. McWHORTER described the device as a "huge ass black powder bomb." The device was approximately 18"-24" tall. McWHORTER initially said it was made out of PVC, but then stated it was probably metal. McWHORTER admitted igniting the device. McWHORTER said he didn't want to be anywhere near it when it went off.

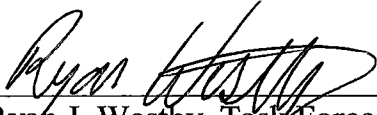
McWHORTER said after he threw the bomb inside he saw a person, who looked “directly at him.” McWHORTER said this occurred at approximately 3:00 a.m. to 4:00 a.m. McWHORTER said, “we were long gone before it went off” (referring to the bomb exploding).

15. In an interview with a Minneapolis FBI Agent on March 13, 2018, McWHORTER described the Dar al-Farooq device as black PVC, approximately 6 inches in diameter and approximately 12 inches long.² McWHORTER said HARI drilled a hole in one of the two end caps and then a thick green wick was placed through the hole. McWHORTER described the wick as very long (2-3 feet).

² As noted in the preceding paragraph, in his March 10, 2018 interview, McWHORTER stated that the device had an overall length of 18 to 24 inches.

16. McWHORTER said a windshield washer fluid plastic container held diesel/gas mixture that was purchased on the way to the mosque using cash. McWHORTER repeated that MORRIS broke the window with a sledge hammer. McWHORTER lit the fuse with a cigarette lighter and threw it a few feet inside the window. The window, McWHORTER stated, was randomly chosen because there was no light on inside.

Further your affiant sayeth not.



Ryan J. Westby, Task Force Officer
Federal Bureau of Investigation

Sworn to before me this
13th day of March, 2018



THE HONORABLE FRANKLIN L. NOEL
UNITED STATES MAGISTRATE JUDGE